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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

February 15, 1996

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, DC 20554

EX PARTE
PRESENTATION

Dear Mr. Caton:

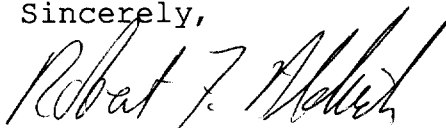
Re: Revision of the Commission's Rules to Ensure
Compatibility With Enhanced 911 Emergency
Calling Systems, CC Docket No. 94-102

Pursuant to the Commission's rules on ex parte presentations, 47 CFR §1.1206(a), we hereby submit information on behalf of the Multi-Media Telecommunications Association ("MMTA") in the above-referenced docket.

On February 9, 1996, Albert Kramer and Robert Aldrich of this law firm met with John Nakahata, Assistant to Chairman Reed Hundt. The matters discussed are described in the enclosed material.

We apologize for the oversight that led to late submission of this letter.

Sincerely,



Robert F. Aldrich

enclosure

cc: John Nakahata

RFA/dkw

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EX PARTE PRESENTATION -- CC DOCKET NO. 94-102

MULTI-MEDIA TELECOMMUNICATIONS ASSOCIATION (MMTA)

- ◆ **SMALL SYSTEM EXEMPTION FROM E911 CPE RULES**
- ◆ **PREEMPTION OF INCONSISTENT STATE REQUIREMENTS**

SUMMARY

- ◆ Small systems: $<$ or $=$ 200 stations
- ◆ Small system compliance costs are very high
- ◆ Most small systems pose no major location problems
- ◆ FCC should --
 - ◆ Exempt small systems from new Part 68 manufacturer requirements
 - ◆ Exempt small systems customers from providing location ID except in special settings
 - ◆ Allow special-setting customers a choice of location ID method
 - ◆ Preempt state requirements conflicting with these principles

COST OF COMPLIANCE

- ◆ Estimated average cost of small systems = \$350 per station
- ◆ Designing built in location ID capability will take time -- and in short run requires designing for technology viewed as obsolescent (CAMA trunks)
- ◆ Short run solutions generally require costly adjunct equipment (current cost est. \$15,000- \$20,000 per system, plus recurring administrative cost)
- ◆ Additional costs for CAMA trunks are substantial (recurring charge est. \$1,200 per system annually -- more if more than two trunks required). Questions re carriers' ability to engineer, install, and maintain thousands or millions of CAMA trunks.

CURRENTLY THERE ARE SOME 3 MILLION SMALL SYSTEMS INSTALLED.

NEED FOR REGULATION IS LIMITED

- ◆ Need for more precise location ID is limited in small-system environment:
 - ◆ Residential PBX-Centrex (e.g., dormitories, apartment buildings)
 - ◆ Multi-location business (e.g., bank branches)
- ◆ Typical small system serving business users on one or a few floors of one building -- does not need to be regulated

ILLINOIS LAW TO TAKE EFFECT JUNE 30, 1996:

"(a) [a new or replacement 'private business switch service'] shall provide to those business end users the same level of 9-1-1 service as the public agency and the telecommunications carrier are providing to other business end users of the local 9-1-1 system. This service shall include, but not be limited to, the capability to identify the telephone number, extension number, and the physical location that is the source of the call to the number designated as the emergency telephone number. . . .

"(b) The private business switch operator is responsible for forwarding end user automatic location identification record information to the 9-1-1 system provider according to the format, frequency, and procedures established by that system provider.

"(c) An Illinois local exchange telecommunications carrier shall file tariffs indicating that as a condition of service to private business switch systems, the systems shall adhere to the requirements of this Act."

50 ILCS 750/15.6

OVERLY BURDENSOME STATE REQUIREMENTS:

- ◆ impose massive and unnecessary compliance costs
- ◆ generate costly litigation among injury victims, employers and equipment and service suppliers
- ◆ lock manufacturers into obsolescent technology
- ◆ complicate the design of CPE for nationwide distribution

CONCLUSION

- ◆ Exempt small systems from new Part 68 manufacturer requirements to small systems
- ◆ Exempt small system customers from providing E911 location ID except in special settings (e.g., residential, multi-site)
- ◆ Allow special-setting customers a choice of location ID method
- ◆ Preempt state requirements conflicting with these principles